

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM McKINNLEY GARLAND (1)
a/k/a Evangelista, a/k/a Lobo,
a/k/a Vangelisa, a/k/a Ville,
a/k/a Lex, a/k/a “V,” a/k/a Victor
Yamaguchi

JALEN ALEXANDER BOBO (2)

SELENA ROSE McCOMBS (3)
a/k/a Harley

ROBBERTA MARIE KHAN (4)
a/k/a Roberta Marie Khan,
a/k/a Ember, a/k/a Scarecrow

ANASTASIYA CLAIRE LYONS (5)
a/k/a Frosty, a/k/a Elena Frost,
a/k/a Ana Frost, a/k/a Bane,
a/k/a Baiine

No. 4:23CR268
Judge Jordan

FILED

JAN 10 2024

Clerk, U.S. District Court
Texas Eastern

FIRST SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2422(a) & 2
(Coercion and Enticement and Aiding
and Abetting)

Between on or about January 21, 2021, and on or about January 27, 2021, in the Eastern District of Texas, and elsewhere, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, “V,” a/k/a Victor Yamaguchi), Jalen Alexander Bobo, and Robberta Khan (a/k/a Roberta Marie Khan, a/k/a Ember, a/k/a Scarecrow)**, defendants, did knowingly persuade,

induce, entice, and coerce an individual, and did knowingly attempt to persuade, induce, entice, and coerce an individual, that is, Victim 1, to travel in interstate commerce, from the State of Ohio to the Eastern District of Texas, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, and aided and abetted in the same.

In violation of 18 U.S.C. §§ 2422(a) and 2.

Count Two

Violation: 18 U.S.C. § 1594(c)
(Conspiracy to Commit Sex Trafficking
by Force, Fraud, and Coercion)

Between in or about 2020, and continuing until the present, in the Eastern District of Texas, and elsewhere, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, “V,” a/k/a Victor Yamaguchi), Jalen Alexander Bobo, Selena Rose McCombs (a/k/a Harley), and Anastasiya Claire Lyons (a/k/a Frosty, a/k/a Elena Frost, a/k/a Ana Frost, a/k/a Bane, a/k/a Baiine),** defendants, in and affecting interstate and foreign commerce, did conspire with each other and with individuals known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means an individual(s) known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause those individuals to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

In violation of 18 U.S.C. § 1594(c).

NOTICE OF FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 2428(a)(1), 28 U.S.C. § 2461, and 18 U.S.C. §§ 1594(d) & (e), upon conviction of the offense(s) alleged in this First Superseding Indictment, the defendants, **William McKinnley Garland (a/k/a Evangelista, a/k/a Lobo, a/k/a Vangelisa, a/k/a Ville, a/k/a Lex, a/k/a, "V," a/k/a Victor Yamaguchi), Jalen Alexander Bobo, Selena Rose McCombs (a/k/a Harley), Robberta Marie Khan (a/k/a Roberta Marie Khan, a/k/a Ember, a/k/a Scarecrow), and Anastasiya Claire Lyons (a/k/a Frosty, a/k/a Elena Frost, a/k/a Ana Frost, a/k/a Bane, a/k/a Baiine)** shall forfeit to the United States their interest in all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following property:

- a. 2008 Land Rover Range Rover, bearing Texas license plate TBG3458 and VIN number SALSK25488A183270;
- b. 2002 Mercedes G Wagon, bearing Texas license plate TGX1981 and VIN number WDCYR49EX2X129477;
- c. 2003 Dodge Viper, bearing Texas license plate RSF9294 and VIN number 1B3JR65Z73V500413;
- d. 2014 Mercedes Benz E Class, bearing Texas temporary buyers license plate 410L76 and VIN number WDDKJ5KB5EF248904;
- e. \$19,749.00 currency seized from 2713 Sowerby Dr., Plano, Texas 75093;
- f. \$14,490.00 currency seized from Anastasiya Claire Lyons;
- g. Kel-Tec 12 gauge shotgun, Model KSG, bearing serial number XYCA70;
- h. Zastava Arms 7.62 caliber AK styled rifle, serial number 270-153530;
- i. CD Defense 9mm, Model PAK-9, serial number R0N2023522;

- j. Glock 9mm, Model 43x, serial number CAVN325;
- k. Smith & Wesson .357 magnum caliber revolver, Model 327, serial number DMD6755;
- l. Kel-Tec 5.7x28 caliber pistol, Model P50, serial number AAEC55;
- m. UTAS 12 gauge, Model UTS-15, serial number US12P19552;
- n. Sig Sauer multi caliber rifle, Model Sig MPX, serial number 62F005937;
- o. Arsenal 7.62 caliber weapon, Model SLR107R, serial number AC602198;
- p. Chiappa Firearms Dayton Ohio .357 magnum caliber, Model Rhino, serial number RH05320;
- q. Kriss .45acp caliber weapon, Model Vector CRB, serial number 45C023907;
- r. CZ 9mm, Model CCP07, serial number D300881;
- s. Springfield armory 9mm weapon, Model XD9, serial number xd109818;
- t. H&K 9mm handgun, Model VP9, serial number 224-292071;
- u. Kel-Tec 9mm, Model Sub 2000, serial number FFZU97;
- v. Century Arms, 7.62 x 39 caliber weapon, Model C39V2, serial number C39V2A37375;
- w. CZ 9mm micro base pistol, Model Scorpion EVO 3 S2, serial number C956245;
- x. CZ 9mm pistol, Model B105, Serial Number C931714;
- y. Kel-Tec 12 gauge shotgun, Model KS7, serial number Q5gG;
- z. FN .45ACP caliber pistol, Model FNX-45, serial number FX3U030442;
- aa. Hudson 9mm pistol, Model MFC-H9, serial number H06679;
- bb. PTR Industries 9mm weapon, Model PTR9, serial number 9MC006706;
- cc. Maxim Defense .62 caliber weapon, serial number MXM-18-129467;
- dd. Franchi 12 gauge shotgun, Model SPAS-12, serial number AA15910;

- ee. Beretta 9mm handgun, Model 92FS, serial number BER827240;
- ff. Beretta 9mm handgun, Model 92, serial number TX16458;
- gg. Ruger 9mm revolver, Model LCR, serial number 549-52977;
- hh. Romarm 7.62 caliber weapon, serial number E-6514-76;
- ii. Izhmash Saiga 12, serial number H09428043T;
- jj. CZ handgun, Model CZS2, 9mm, serial number D310659;
- kk. CZ handgun, Model CZ75B, 9mm, serial number 380;
- ll. Magnum research, 50ae caliber, Model Desert Eagle, serial number DK0068044;
- mm. Ruger .357 caliber handgun, Model GP100, serial number 170-04882;
- nn. Iwi Jericho 941 9mm pistol, serial number J0009616;
- oo. Spikes tactical multi-caliber, Model skull, serial number BSK000082;
- pp. CEV Technologies 9mm pistol, Model OZ-9, serial number ZAO3227;
- qq. Glock 9mm handgun, Model 48, serial number BRLT334;
- rr. Tiran tactical 9mm handgun, Model STI combat master 2011, serial number TX08435;
- ss. Chiappa Firearms Dayton Ohio .357 caliber, Model Rhino 60DS, serial number CFIT20H02441;
- tt. Calico 9mm rifle, Model Liberty 100, serial number B003473;
- uu. Mateba Arms .44 magnum caliber, Model Unica6, serial number 12068 or 001852;
- vv. Zev Technologies multi-caliber AR styled rifle, Model CEV-FL, serial number ZF104683;
- ww. Cobalt Kinetics multi-caliber, Model BAMF, serial number B16C168;
- xx. Remington Versa Max, 12 gauge shotgun, serial number RT30786B;
- yy. FN Scar 7.62 caliber rifle, Model 17s. serial number H0C19580;

- zz. Smith & Wesson .357 caliber revolver handgun, Model M&P R8, serial number DJB7697;
- aaa. Korth Night Hawk custom revolver, Model NXS 8-shot, serial number AH1754;
- bbb. Mossin Nagant revolver, Model 19995, 7.62 x 38 caliber, serial number 25749;
- ccc. Korth Night Hawk custom revolver, Model NXS 8-shot, serial number AH2773;
- ddd. Smith & Wesson revolver with attached scope, Model 500, 500 magnum caliber, serial number BCE9497;
- eee. Charles Daly Chiappa honcho tactical pump 20 gauge firearm, serial number CD20PA20V-0042;
- fff. FN Herstal 5.7x28 caliber, Model 57, serial number 386368154;
- ggg. Daniel Defense multi-caliber pistol, Model DDM4, serial number DDM4258008;
- hhh. Taurus multi-caliber revolver, Model 4510 Judge, serial number A452791;
- iii. Benelli 12 gauge shotgun, Model M4, serial number Y126016B20;
- jjj. Salient Arms multi-caliber rifle, Model SAI-T2, serial number SAI000500;
- kkk. FN Herstal Belgium 5.56 caliber weapon, Model FS2000, serial number 086102;
- lll. FN 12 gauge, Model unknown, serial number FL020878;
- mmm. Daniel Defense 5.56 caliber semi-auto rifle, Model DDM4 v7, serial number DDM4312680;
- nnn. Zrodelta, multi-caliber rifle, Model Ready Series, serial number ZAR01760;
- ooo. H&K 9mm handgun, Model GMBH, serial number 84331;
- ppp. Kel-Tec 12 gauge shotgun, Model KSG, serial number XX6070;
- qqq. M249 5.56 caliber handgun, serial number 9348441;

- rrr. Israel Weapon Industries, Tavor 5.56 caliber weapon, Model x95, serial number T1007313;
- sss. B&T 9mm machine pistol, Model TP9, serial number 20-34893;
- ttt. FN Herstal 5.7x28 caliber rifle, serial number FN086982;
- uuu. Sig Sauer multi-caliber handgun, Model Sig MPX Copperhead, serial number 62E006850;
- vvv. Springfield Armory 9mm handgun, Model Echelon, serial number BE235224 (with streamlight attached);
- www. Kel-Tec .22 caliber handgun, Model PMR-30, serial number WXYC07;
- xxx. Beretta 9mm handgun, Model 92x, serial number BST30021;
- yyy. Magnum research .50 caliber handgun, Model Desert Eagle, serial number DK0032851;
- zzz. Glock 9mm handgun, Model 45, serial number BRKU357;
- aaaa. Sig Sauer 9mm handgun, Model P365, serial number 66B390958;
- bbbb. Glock 9mm handgun, Model 34, serial number BNTM805;
- cccc. Sig Sauer 9mm handgun Model P320, serial number 58C279594;
- dddd. Glock 9mm handgun, Model 43, serial number bftn027;
- eeee. Rifle with serial number VX4102; and
- ffff. All such proceeds and/or instrumentalities are subject to forfeiture by the government.

If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been comingled with other property, which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C.


§ 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

A TRUE BILL



GRAND JURY FOREPERSON

DAMIEN M. DIGGS
UNITED STATES ATTORNEY



MARISA J. MILLER
Assistant United States Attorney

Date: 1/10/24

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JALEN ALEXANDER BOBO (2)	§	
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a/k/a Baiine	§	
	§	

NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. §§ 2422(a) and 2

Penalty: Imprisonment for not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00

Count Two

Violation: 18 U.S.C. § 1594(c)

Penalty: Imprisonment for not more than life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00